

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

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DAVID BLACK. )  
Petitioner, )  
 )  
v. )  
 )  
CHADWICK DOTSON, ) Civil Action No. 1:21-cv-472 PTG-WBP  
Respondent. )  
 )  
 )

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**MOTION FOR LEAVE TO CONDUCT DISCOVERY  
AND FOR A COURT ORDER TO OBTAIN DOCUMENTS**

Petitioner David Black, by and through undersigned counsel, respectfully requests that the Court grant Petitioner leave to conduct discovery pursuant to 28 U.S.C. § 2554(e)(2) and Rule 6(a) of the Rules Governing 28 U.S.C. § 2554 Cases in the above matter. Simultaneous with the filing of this Motion, Counsel has filed a Motion to Seal the Motion for Discovery, the required non-confidential supporting documentation, the LCvR 5(C) Notice, and the proposed sealed (unredacted) document. Pursuant to Chapter 8 of this Court's E-Filing Policies and Procedural Manual – Filing Documents that Require Leave of the Court – a redacted version of Petitioner's Motion for Discovery is attached.

DATED THIS 3rd day of May, 2024.

Respectfully submitted,

/s/ David Benowitz \_\_\_\_\_  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 3rd day of May 2024, a copy of the foregoing motion has been electronically served on the parties in this case via the Court's CM/ECF system.

/s/  
**David Benowitz**